

Exhibit G

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA**

JONATHAN R., *et al.*,

Plaintiffs,

v.

JIM JUSTICE, *et al.*,

Defendants.

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Case No. 3:19-cv-00710

Plaintiffs, through counsel, submit their pretrial disclosures under Federal Rule of Civil Procedure 26(a)(3) and the Court's scheduling order. ECF No. 491.

FRCP 26(a)(3)(A)(i)—The name and, if not previously provided, the address and telephone number of each witness—separately identifying those the party expects to present and those it may call if the need arises.

Plaintiffs may call the following witnesses at trial, some of whom, including Jeremiah Samples, Stephanie Williams, Tim Reynolds, will be sent a third-party subpoena for testimony.

WITNESS SUMMARIES

1. Araina Moore

(304) 582-5641

██
Martinsburg, WV ██████████

Araina Moore is a former foster child who has been in and out of foster care for much of her teenage years. She will testify about her experiences in foster care and issues related to her placements, including residential treatment facilities, and the services and resources provided to her or lack thereof.

2. Brittany Payne

(202) 277-3727

████████████████████
Talcott, WV ██████████

Brittany Payne who worked as a CPS worker for DHHR in 2023. She will testify about her experiences as a case worker, including issues related to case worker hiring, training, supervision, and responsibilities. She will testify regarding the excessive caseloads that CPS workers must carry. She will also testify regarding the Department's organizational culture and its general treatment of caseworkers and foster children. She will also testify regarding backlogs in referrals and inadequacies in investigations, challenges in securing placements for children, DoHS supervision over children in care, and the provision of services to children in care and their parents.

3. Carrie Jackson

(681) 460-6802

[REDACTED]

Charleston, WV [REDACTED]

Carrie Jackson is the biological parent of a child in foster care. She will testify about her experiences interacting with DoHS and DoHS caseworkers. She will also testify about the provision of services to children in care.

4. Debora Pigman

(859) 230-4084

[REDACTED]

Moorehead, KY [REDACTED]

Debora Pigman was a CPS worker for DHHR from 2011 to 2023. She will testify about her experiences as a case worker, including issues related to case worker hiring, training, supervision, and responsibilities, and the Department's organizational culture. She will testify regarding the excessive caseloads that CPS workers must carry. She will also testify regarding backlogs in referrals and inadequacies in investigations, challenges in securing placements for children, DoHS supervision over children in care, and the provision of services to children in care and their parents.

5. Elizabeth Layne Diehl, Esq.

(304) 268-8832

[REDACTED]

Martinsburg, WV [REDACTED]

Elizabeth Layne Diehl, Esq. is an attorney practicing in Martinsburg, West Virginia. She will testify to issues with the provision of services to children and parents, inadequate

placements and placement array, and failures of caseworkers to communicate with various stakeholders.

6. Gordon Simmons

(304) 395-6294

[REDACTED]

Charleston, WV [REDACTED]

Gordon Simmons was a field organizer for the union that represented DoHS CPS workers. He handled numerous CPS worker grievances over the course of his tenure. Simmons will testify regarding the day-to-day challenges facing CPS workers, including managing high caseloads and other responsibilities and inadequacies in case worker training and experience.

7. Heather Dalton

(304) 698-2606

[REDACTED]

Moatsville, WV [REDACTED]

Heather Dalton has been a CPS worker for 13 years. She has handled both investigations and ongoing cases. She will testify about the day-to-day challenges facing CPS workers, including high caseloads and high turnover of case workers. She will also testify about the organizational culture and environment within DoHS.

8. Jennifer Taylor, Esq.

(304) 342-1887

1118 Kanaugh Blvd. East

Charleston, WV 25314

Jennifer Taylor, Esq. is an attorney practicing in Charleston, West Virginia. She intermediates between the court and CPS workers regarding children's court cases. She will testify about the adequacy of CPS workers' preparation for and submissions to the court concerning ongoing cases, as well as the court's reactions to CPS workers. She will also testify to the challenges that come with high caseworker caseloads, constant turnover and inadequate training and experience, as well as issues with the provision of services to children and parents.

9. Jessica Combs

(304) 722-3962

[REDACTED]

St. Albans, WV [REDACTED]

Jessica Combs has fostered multiple children and adopted children whose parents' parental rights had been terminated. She will testify about her experiences as a foster parent, including her interactions with DoHS caseworkers and the employees of private agencies who contract with DoHS and the execution of their responsibilities to the children in her care. She will also testify about challenges in obtaining services for the children, and her observations regarding parental visitation and services to parents.

10. Marissa Sanders

(304) 993-2885
[REDACTED]

Roseville, MN [REDACTED]

Marissa Sanders is a former foster parent who adopted the child whom she fostered. She is also the founder of the Foster, Adoptive, and Kinship Parents Network. She will testify about her experiences and those of other foster parents' with DoHS workers and caseworkers employed by private CPAs. She will also testify regarding inadequacies in the provision of services to children and parents, and the implementation and effectiveness of programs that DoHS has put in place to address children with acute mental health needs, including the CSED waiver program and other similar initiatives.

11. Stacy Jacques

(304) 767-4369

Stacy Jacques, Esq. is an attorney practicing law in Charleston, West Virginia. She is also a former foster parent, mother of adopted foster children, and member of the West Virginia Foster, Adoptive, and Kinship Parents Network. She will testify about her knowledge of interactions between foster parents and with DoHS and CPA workers, challenges in obtaining services for children and parents, including restrictions on providers and challenges in utilizing DoHS programs for children with mental health needs, the costs and funding for foster parents, training, and trends in child placements, including increasing privatization of the system.

12. Stephanie Williams

(304) 520-9340
163 Cottage Drive
Lewisburg, WV 24901

Stephanie Williams is the Executive Director of Davis Stuart Inc. She will be asked to testify regarding her experience working with DoHS and CPAs as a services provider for children in care, challenges with provider payments and contracting, DoHS's collaboration with providers to address service gaps, and DoHS's forthcoming initiative to eliminate lower-level treatment facilities. She will also be asked to testify regarding her observations of caseworkers visiting children at Davis Stuart.

13. Timothy Reynolds

(304) 575-9117
163 Cottage Drive
Lewisburg, WV 24901

Timothy Reynolds is the Director of Operations at Davis Stuart Inc. He will be asked to testify regarding his experience working with DoHS and CPAs as a services provider for children in care, challenges with provider payments and contracting, DoHS's collaboration with providers to address service gaps, and DoHS's forthcoming initiative to eliminate lower-level treatment facilities. He will also be asked to testify regarding his observations of caseworkers visiting children at Davis Stuart.

14. Olivia Frausto

(681) 446-0170

██████████
Martinsburg, WV ██████████

Olivia Frausto is a former foster child. While she was in foster care, she gave birth to a child whom DoHS removed from her custody. She will testify about her experiences in foster care, her interactions with caseworkers and the court, the challenges she encountered in various placements and treatment facilities, difficulties obtaining services and health care, and her experiences with DoHS regarding the removal of her daughter.

15. Charla Cody

(304) 279-0992

██████████
The Villages, FL ██████████

Charla Cody formerly served as a kinship placement for her granddaughter. She will testify regarding her experiences as a kinship placement, including her interactions with DoHS and her challenges in obtaining financial and other support from DoHS as well as obtaining care and services for her granddaughter. She will also testify regarding her granddaughter's experiences in other placements, including treatment facilities, both in and out of state.

16. Kathie Giboney

(304) 299-2811
[REDACTED]
St. Mary's, WV [REDACTED]

Kathie Giboney was a CPS worker for DHHR/DoHS from 2019 to 2024. She will testify about her experiences as a case worker, including issues related to case worker hiring, training, supervision, and responsibilities, and the Department's organizational culture. She will testify regarding the excessive caseloads that CPS workers must carry. She will also testify regarding backlogs in referrals and inadequacies in investigations, challenges in securing placements for children, DoHS supervision over children in care, and the provision of services to children in care and their parents.

17. Sarah Cody

(681)702-5292
[REDACTED]
Gerrardstown, WV [REDACTED]

Sarah Cody is the granddaughter of witness Charla Cody. She is a former foster child who has been in and out of foster care, including residential placements. She will testify about her experiences in foster care and issues related to her placements, including residential facilities. She will also testify regarding about her experiences with DoHS and the care, or lack thereof, received from DoHS.

Respectfully submitted,

/s/ Marcia Robinson Lowry

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